

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA	§	
	§	
	§	No. 4:15-MJ-288-BJ
	§	
ROBIE LYNN SIMS (01)	§	

DEFENDANT'S MOTION TO CONTINUE HEARING
ON MOTION TO REVOKE PRETRIAL RELEASE

Defendant, Robie Lynn Sims, by and through her undersigned counsel, LANCE T. EVANS, hereby moves to continue the pretrial release revocation hearing. In support thereof, she would respectfully show the Court the following:

I.

On August 14, 2015, a hearing was held on "Government's Motion to Revoke Pretrial Release. This hearing was continued until Friday, August 21, 2015 at 10:00 a.m., in part so that Defendant could be seen at Fort Worth Perinatal Associates, 1250 8th Avenue, Suite 570, Fort Worth, Texas. Defendant believed that her appointment would be set sometime Tuesday, August 18th or Wednesday, August 19th.

II.

There were problems scheduling Defendant's appointment on those dates. Defendant's appointment with Fort Worth Perinatal Associates is now set for Tuesday, August 25, 2015 at 9:45 a.m. Further, Defendant has an appointment with her obstetrician, Dr. Dana Snell-Hargrove, on Monday, August 24th at 9:00 a.m.

III.

Defendant asks that this hearing be continued until Friday, August 28th. This motion is not made for purposes of delay but to insure that Defendant receives proper medical care prior to any decision on whether or not to revoke her pretrial release.

For the foregoing reasons, Sims prays that the Court continue the pretrial release revocation hearing to Friday, August 28, 2015.

Respectfully Submitted,

/s/ Lance T. Evans

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CERTIFICATE OF CONFERENCE

I, LANCE T. EVANS, hereby certify that on August 20, 2015, I conferred with Assistant United States Attorney SHAWN SMITH, counsel for the government, regarding the foregoing motion. Mr. Smith advised that the government takes no position on this motion.

/s/ Lance T. Evans

LANCE T. EVANS

CERTIFICATE OF SERVICE

I, LANCE T. EVANS, hereby certify that on August 20, 2015, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic filing system for the court.

/s/ Lance T. Evans
LANCE T. EVANS